

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY - TRENTON VICINAGE

Shanee N. Pollitt, on
behalf of herself and those
similarly situated,

ELECTRONICALLY FILED

Plaintiff,

CIVIL ACTION NO.: 3:10-cv-01285-
AET-DEA

vs.

DRS Towing, LLC, d/b/a
Advanced Financial
Services; Wachovia Dealer
Services, Inc. d/b/a WDS,
Inc., WFS Financial, and
WFS Financial Inc.; State
Line Auto Auction; and John
Does 1 to 10,

**JOINT MOTION BY PLAINTIFF AND
DEFENDANTS WACHOVIA DEALER
SERVICES, INC. d/b/a WDS, INC., WFS
FINANCIAL AND WFS FINANCIAL, INC.
AND STATE LINE AUTO AUCTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Defendants.

TO: Michael K. Willison, Esquire,
Counsel for Defendant DRS Towing, LLC
Dickie, McCamey & Chilcote, P.C.

John North, Esq.,
Counsel for Wachovia Dealer Services, Inc. d/b/a WDS, Inc.,
WFS Financial, and WFS Financial Inc.
Greenbaum, Rowe, Smith & Davis, LLP

Warren F. Sperling
Counsel for State Line Auto Auction
Bennett, Bricklin & Salzburg LLC

PLEASE TAKE NOTICE that on February 21, 2012 Plaintiff and Defendants Wachovia Dealer Services, Inc. and State Line Auto Auction("the Moving Parties") will jointly apply to the United State District Court of the District of New Jersey for the entry of an order granting preliminary approval a class action settlement, certification of the Fed.R.Civ.P. 23(b)(3) settlement class,

appointment of Settlement Class Representative and Class Counsel, and scheduling of a Fairness Hearing.

PLEASE TAKE FURTHER NOTICE that the parties having previously consented to the jurisdiction of the Magistrate Judge request that this matter be referred to the Honorable Douglas E. Arpert, U.S.M.J., United States Magistrate Judge for disposition;

PLEASE TAKE FURTHER NOTICE that the Moving Parties will rely upon the Declarations of Christopher J. McGinn Esq., and Andrew R. Wolf, Esq., the brief in support of said motion and the proposed form of Order; and

PLEASE TAKE FURTHER NOTICE no opposition to this motion is anticipated at this time. In the event that said opposition is filed, the Moving Parties request oral argument.

Dated: January 27, 2012 /s Christopher J. McGinn, Esq.
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